

FEDERAL BUREAU OF INVESTIGATION

REGULATORY INSPECTION REPORT (18 USC 2257)

OF

**Robert Hill Releasing Company
21598 Marilla St.
Chatsworth, CA 91311**

Date of Inspection: 08/01/2006

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REGULATORY INSPECTIONS REPORT

Report of: SSA Charles R. Joyner,
Regulatory Inspections Unit,
Violent Crime Section, Criminal Investigative Division
Report Date: August 16, 2006
File Number: [REDACTED] (F) Robert Hill

PRODUCER INFORMATION

An inspection was conducted of Robert Hill Releasing Company pursuant to Title 18 United States Code Section 2257 and 28 Code of Federal Regulations Part 75. The review of performer identification information and the record keeping system of Robert Hill Releasing Company was conducted on August 1, 2006, at 21598 Marilla Street, Chatsworth, CA 91311. [REDACTED] owner of Robert Hill Releasing Company, office telephone number (800)977-3866, fax number (818)763-6118, was identified as the point-of-contact (POC). [REDACTED] is listed on Robert Hill Releasing Company merchandise as the Custodian of Records. He was determined to be [REDACTED] cell phone number [REDACTED]. Upon receiving a telephone call from [REDACTED] arrived at the business and was present during most of the inspection.

INSPECTION SUMMARY

DVDs produced by Robert Hill Releasing Company were ordered from the internet. Contract inspectors reviewed 11 DVDs and identified all performers by stage name or by still photographs taken from the video. All videos reviewed contained the required 2257 information in the proper format. A total of 89 performers were identified as appearing in the 11 DVDs. Prior to the inspection, contract inspectors printed several still photographs of each performer's face from different camera angles. During the inspection, the still photographs were compared with the performer identification on record to ensure the identification was, in fact, of that performer.

After an inspection on August 1, 2006, it was determined Robert Hill Releasing Company had several 2257 violations. These included: eleven performers were only identified by Thai identification which uses the Buddhist calendar, so DOBs could not be readily determined; no identification was available for ten performers; identification photographs of two performers were of such poor quality that the performers were not recognizable; records were not kept in alphabetical order by performers' names; some names were not cross-referenced; and one performer was later determined to be underage. Details of these violations are listed in the findings section of this report. Copies of available pertinent records were made by the inspection team.

During this inspection, all provisions of 18 USC 2257 guidelines were followed by the inspection team.

FINDINGS

1. **An underage performer appeared in "Kahatoey the 3rd Sex."** The DOB for all performers appearing in "Kahatoey the 3rd Sex" could not be readily identified. The Thai identification documents on record use the Buddhist calendar, so the inspection team was unable to determine actual DOB until researching the Buddhist calendar and having the results confirmed by an FBI Thai translator. Stage names of performers appearing in the movie are (P-1) (P-1) has a DOB of (P-1). The production date of the movie was 03/09/2006, so (P-1) was no older than 17 at the time of filming. **(Tab 2a)**
2. The DOB for all performers appearing in "Teenage Asian Transsexuals #2" could not be readily identified. The Thai identification documents on record use the Buddhist calendar. Actual DOB was determined later after researching the Buddhist calendar and having the results confirmed by an FBI Thai translator. Stage names of performers appearing in the movie are (P-1) **(Tab 2b)**
3. No identification records were present for performer (P-1) appearing in "Teenage Asian Transsexuals #2."
4. Records were maintained alphabetically by movie title. Records were not maintained alphabetically by performers' names and it was not possible to check records by name.
5. The photograph for (P-1) appearing in "Summer Girls" was not recognizable due to the poor quality of the photocopy. **(Tab 2c)**
6. In "Teenage Transsexual Nurses #6," performer (P-1) was listed in the credits as (P-1) but listed in Robert Hill Releasing Company records as (P-1). This represents a failure to cross reference known stage names.
7. No records were on site for (P-1) and an unknown male appearing in "The Beautiful Moon God and His Sex Magic."
8. No records were on site for (P-1) appearing in "My Dream Girls #2."
9. No records were on site for (P-1) appearing in "Teenage Transsexual Nurses #2."
10. Production dates were not listed with the 2257 information on the DVDs of "Blowjobs Across Los Angeles #2," "Kahatoey the 3rd Sex," "Teenage Asian Transsexuals #2," and "Teenage Transsexual Nurses #2."

Producer Response to Findings:

1. [REDACTED] later provided notarized documentation indicating DOB for all performers appearing in "Kahatoey, the 3rd Sex." However, the format was still in the Buddhist calendar and [REDACTED] then listed the age in years of each performer. All ages were listed accurately with the exception of [REDACTED] (P-1) Appleson listed [REDACTED] as being 18 years old. (Tab 2d) (P-1)
2. [REDACTED] later provided notarized documentation indicating DOB for all performers appearing in "Teenage Transsexuals #2," with the exception of performer Mai Tai. (Tab 2e)
3. **No identification records were provided for Mai Tai.**
4. No response. [REDACTED] was advised of the requirement to maintain 2257 records by performers' names.
5. An identifiable photo identification of [REDACTED] (P-1) was later provided.
6. No response. [REDACTED] was advised of the need to properly cross reference performers' stage names.
7. The unknown male was identified as [REDACTED] (P-1) Identification records were later provided for [REDACTED] (P-1)
8. Identification records were later provided for [REDACTED] (P-1) [REDACTED] (P-1)
9. Identification records were later provided for [REDACTED] (P-1)
10. No response.

Finding
Robert Hill Releasing Co.
8/1/06

1. Khatoey The Third Sex

Infraction: No DOB for identification of models

Action taken: a translation of the model's DOB has been made, notarized and place in this package.

2. Summer Girls Vol. 1

Infraction: [REDACTED] (P-1) (Photo not identifiable (poor Quality))

Action taken: Added a better quality identification card to this package.

3. Teenage Transsexual Nurses Vol. 6

Infraction: Actor's true name is [REDACTED] (P-1) - stage name credits was [REDACTED] (P-1) but Hill records have [REDACTED] (P-1) (failure to list all stage names, failure to cross reference).

Action Taken: The alias [REDACTED] (P-1) has been added to the original model release/contract and a copy has been placed in this package.

4. Teenage Asian Transsexuals Vol. 2

Infraction: No DOB for identification of models

Action taken: a translation of the model's DOB has been made, notarized and place in this package.

5. The beautiful Moon God and His Sex Magic Vol. 1

Infraction: Identification for [REDACTED] (P-1) was provided by Hill, also same is true for [REDACTED] (P-1)

Action Taken: the identification of [REDACTED] (P-1) (Stage Name [REDACTED] (P-1)) was added to this package.

6. Blow Jobs Across Los Angeles Vol. 2

Infraction: Poor photo of [REDACTED] (P-1) unable to identify. Late providing good identification during inspection.

7. Teenage Transsexual Nurses Vol. 2

Infraction: Identification for (P-1) not in file, but emailed from outside source during inspection.

Action Taken: None, because identification was given during inspection.

8. My Dream Girl Vol. 3

Infraction: Failure to cross reference stage names: Photo of stage name (P-1) was identifiable with DVD actor, however (P-1) was not in the movie credits. Her true name is (P-1). There is a (P-1) in the credits.

Action Taken: The alias (P-1) has been added to the original model release/contract and a copy has been placed in this package.

9. The Beautiful Moon God and his Sex Magic Vol. 1

Infraction: Unknown male was engaged in sexual activity with (P-1) (P-1) was not identified by records of Robert Hill.

Action Taken (P-1) was the unknown male that was engaged in sexual activity with (P-1) and his identification was added to this package.

10. My Dream Girl Vol. 6

Infraction: Identifications not in file (P-1) (this identification was given during inspection) (P-1)

Action Taken: Model Releases and Identification on the 4 missing actors has been added to this package.

11. Summer Girls vol. 6

Stage name (P-1) listed in credits not identified in records of Robert Hill shown to (P-1) Unknown male transsexual from DVD could not be identified by (P-1) observed copy of identification provided by Robert Hill from their file on this Summer Girls Vol. 6 title and advised he could not recognize the photo identification provided for the stage name (P-1) true name (P-1)

Action Taken: A copy of the original model's contract in Portuguese for this production was added to this package and a letter from the producer verifying the identity.

PRE-INSPECTION PROCEDURES

The following Pre-Inspection Procedures were followed:

1. Robert Hill Releasing Company was randomly selected from a data base provided by FBIHQ of known producers of adult products using a computerized random selection program.
2. A sample of Robert Hill Releasing Company DVDs was ordered and the method of purchase was documented and maintained in a 1A envelope with the case file.
3. All products ordered were reviewed for 18 USC 2257 compliance and a pre-inspection analysis was conducted for each of the DVDs ordered.
4. All performers depicted in the videos engaging in sexually explicit conduct were identified by either a stage name or by still photographs of their likeness taken from the video.

INSPECTION PROCEDURES

The following Inspection Procedures were followed:

1. Inspection began at 9:40 a.m. during regular business hours.
2. SSA Charles Joyner, the Lead Inspector, immediately identified himself and the purpose of the inspection upon entering Robert Hill Releasing Company.
3. SSA Joyner explained the nature and purpose of the inspection, including the limited nature of the records inspection.
4. Digital photographs were taken of the business and the room used to store 2257 information prior to the inspection. A disc containing a total of 15 photographs were placed in a 1A envelope and maintained with the case file.
5. Inspectors reviewed the 18 USC 2257 records maintained by Robert Hill Releasing Company for the 11 videos reviewed, to include the performers appearing therein.
6. Copies were made of the selected performers' identifications indicating date of birth.
7. The inspection concluded at 4:30 p.m.
8. Digital photographs were taken of the room used to store 2257 information prior to the inspectors departing the place of business.

(P-1)

Robert Hill Releasing Company

VIDEO	PROD. DATE	PERFORMER NAME	DOB	TRUE NAME
PILE DRIVER	3/25/2004			
PILE DRIVER				
PILE DRIVER				
PILE DRIVER				
PILE DRIVER				
PILE DRIVER				
SUMMER GIRLS 6	8/17/2002			
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS 6				
SUMMER GIRLS AND SOME ARE NOT	6/8, 7/9, & 7/29/99			
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
SUMMER GIRLS AND SOME ARE NOT				
TEENAGE ASIAN TRANSSEXUAL 2	3/6/2006			
TEENAGE ASIAN TRANSSEXUAL 2				
TEENAGE ASIAN TRANSSEXUAL 2				
TEENAGE ASIAN TRANSSEXUAL 2				
TEENAGE ASIAN TRANSSEXUAL 2				
TEENAGE ASIAN TRANSSEXUAL 2				
TEENAGE ASIAN TRANSSEXUAL 2				
TEENAGE ASIAN TRANSSEXUAL 2				
TEENAGE TRANSSEXUAL NURSES 2	11/29/2002			
TEENAGE TRANSSEXUAL NURSES 2				
TEENAGE TRANSSEXUAL NURSES 2				
TEENAGE TRANSSEXUAL NURSES 2				
TEENAGE TRANSSEXUAL NURSES 2				
TEENAGE TRANSSEXUAL NURSES 2				
TEENAGE TRANSSEXUAL NURSES 6	5/20/2005			
TEENAGE TRANSSEXUAL NURSES 6				
TEENAGE TRANSSEXUAL NURSES 6				
TEENAGE TRANSSEXUAL NURSES 6				

(P-1)

SUBJECT TO PROTECTIVE ORDER

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FBI_000106

Robert Hill Releasing Company

VIDEO	PROD. DATE	PERFORMER NAME	DOB	TRUE NAME
TEENAGE TRANSSEXUAL NURSES 6		(P-1)		
TEENAGE TRANSSEXUAL NURSES 6				
TEENAGE TRANSSEXUAL NURSES 6				
THE BEAUTIFUL MOON GOD AND HIS SEX MAGIC	8/24/2001			
THE BEAUTIFUL MOON GOD AND HIS SEX MAGIC				
THE BEAUTIFUL MOON GOD AND HIS SEX MAGIC				
THE BEAUTIFUL MOON GOD AND HIS SEX MAGIC				
THE BEAUTIFUL MOON GOD AND HIS SEX MAGIC				
THE BEAUTIFUL MOON GOD AND HIS SEX MAGIC				
THE BEAUTIFUL MOON GOD AND HIS SEX MAGIC				

SUBJECT TO PROTECTIVE ORDER

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FBI_000107

PHOTO LOG/PHOTOS

INSPECTION COMPLIANCE DETERMINATION

Robert Hill Releasing Company was found **NOT** to be in compliance with 18 USC 2257 and 28 CFR 75. In addition, it was determined an underage performer was depicted engaging in sexual activity in the movie "Khatoev the 3rd Sex." (P-1)
(P-1) The listed production date of Khatoev the 3rd Sex was 03/09/2006, so (P-1) was no older than 17 at the time of filming.

This information was provided to SSA Greg Scott, Los Angeles Field Office supervisor of Squad CY-4 (Crimes Against Children) and the S.A.F.E. team. A meeting was held on 08/28/2006 to discuss the matter of an underage performer with the U.S. Attorney's Office. AUSA Tom O'Brien, Chief, Criminal Division, declined prosecution.